

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, individually, and on behalf of all
others similarly situated, JANE DOE 2,
individually and on behalf of all others similarly
situated, JANE DOE 3, individually and on behalf
of all others similarly situated, JANE DOE 4, individually
and on behalf of all others similarly situated,
JANE DOE 5, individually and on behalf of all others
Similarly situated, and JANE DOE 6, individually
and on behalf of all others similarly situated,

Plaintiffs,

Civil Action No: 1:23-cv-10301-AS

v.

GOVERNMENT OF THE UNITED STATES VIRGIN
ISLANDS, FIRST LADY CECILE DE JONGH,
GOVERNOR KENNETH MAPP, SENATOR
CELESTINO WHITE, ATTORNEY GENERAL
VICENT FRAZER, GOVERNOR JOHN DE JONGH,
SENATOR CARLTON DOWE, DELEGATE
STACEY PLASKETT, and JOHN DOES 1-100,

Defendants.

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DECLARATION OF JORDAN MERSON IN OPPOSITION

I, Jordan Merson, Esq., hereby declare as follows:

1. I am a member of the law firm Merson Law, PLLC and counsel for Plaintiffs in this
action.

2. I make this Declaration in opposition to Defendants' motions to dismiss, together
with such other and further relief as this Court deems just and proper.

3. In support thereof, I annex:

Exhibit A – Corrected Second Amended Complaint, dated May 10, 2024;

Exhibit B – Affidavit of Sen. Brad Holyman, dated March 26, 2024;

Exhibit C – J.P. Morgan's Memorandum of Law in opposition to the
motion to strike affirmative defenses, and J.P. Morgan's Memorandum of

Law in support of summary judgment in *USVI v. JP Morgan*, 22-CV-10904;

Exhibit D – USVI’s Complaint in *USVI v. JP Morgan*, 22-CV-10904;

Exhibit E – Emails pertaining to Defendant Plaskett;

Exhibit F – Emails regarding Mapp, Business in N.Y., Plaskett, de Jongh \$50m loan;

Exhibit G – Affidavit of Susan Cortina, dated April 10, 2024, with attachments;

Exhibit H - Proofs of service dated April 16, 2024;

Exhibit I – Emails concerning Epstein’s payments;

Exhibit J- Plaintiffs’ response to Defendants’ Complaint Charts;

Exhibit K- Plaintiffs’ illustration of New York Contacts;

Exhibit L- Excerpts from Stacey Plaskett’s deposition, held on May 9, 2023;

Exhibit M- Redacted Affidavits of Jane Does;

Exhibit N – Emails and corresponding Participation/Benefit Chart;

Exhibit O – Plaintiffs’ Opposition to the Motion to Dismiss, dated May 8, 2024;

Exhibit P – Plaintiffs’ Affirmation of Service on Cecile de Jongh, dated January 8, 2024;

Exhibit Q – Transcript of the Deposition of Carlyn Irwin in *USVI v. JP Morgan Chase Bank*, dated July 6, 2023;

Exhibit R – Email regarding Dowe’s Election to VIPA; and

Exhibit S – Emails regarding USVI Customs Officers.

Dated: August 14, 2024
New York, New York

Respectfully submitted,

MERSON LAW PLLC

By: /s/ Jordan Merson

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